

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

THERESA STUMPF, on behalf of herself and a class,	)	
	)	
	)	
Plaintiff,	)	12-cv-4688
	)	
vs.	)	Judge Gettleman
	)	
PYOD, LLC, WELTMAN, WEINBERG & REIS CO., LPA, and RESURGENT CAPITAL SERVICES, L.P.	)	Magistrate Judge Gilbert
	)	
Defendants.	)	

**DEFENDANTS' UNOPPOSED MOTION  
FOR EXTENSION OF DISCOVERY SCHEDULE**

Defendants PYOD, LLC (“PYOD”), Weltman, Weinberg & Reis Co., LPA (“WWR”), and Resurgent Capital Services, L.P. (“Resurgent”) (collectively “Defendants”), by and through their attorneys, hereby moves this Court for a 60-day extension to the discovery cutoff. In support of their motion, Defendants state as follows:

1. On October 30, 2012, the Court entered an order setting the close of discovery for April 23, 2012. (Dkt. 35.) On the same day, the Court entered an order referring the case to Magistrate Judge Gilbert for discovery and settlement. (Dkt. 35.) Judge Gilbert subsequently recused himself and on November 9, 2012, the case was reassigned to Judge Soat-Brown. (Dkt. 38.)

2. The parties have subsequently engaged in discovery and a settlement conference before Judge Soat-Brown is scheduled for March 5, 2013.

3. On January 24, 2013, Plaintiffs filed a motion to amend to add a new defendant, Resurgent Capital Services, L.P.

4. On January 31, 2013, the Court granted Plaintiffs' motion to amend.
5. The addition of Resurgent as a defendant will require an extension to the discovery cutoff if the parties are unable to settle.
6. Plaintiffs' counsel has agreed not to oppose this request for an extension.
7. Defendants bring the motion in good faith and not to delay the proceedings unnecessarily.

WHEREFORE, Defendants respectfully request that this Court enter an order extending all discovery deadlines by sixty (60) days.

Date: February 14, 2013

Respectfully submitted,

PYOD, LLC, WELTMAN, WEINBERG &  
REIS CO., LPA, and RESURGENT CAPITAL  
SERVICES, L.P.

By: s/ Gary S. Caplan

One of Their Attorneys

Gary S. Caplan (Atty. # 6198263)  
David A. Maas (Atty. # 6306482)  
REED SMITH LLP  
10 South Wacker Drive  
Chicago, Illinois 60606  
Telephone: (312) 207-1000  
Fax: (312) 207-6400  
[gcaplan@reedsmith.com](mailto:gcaplan@reedsmith.com)  
[dmaas@reedsmith.com](mailto:dmaas@reedsmith.com)

**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that a copy of the aforementioned **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF DISCOVERY SCHEDULE** was served on the party below at using ECF System, which will send notification of the filing to Counsel of Record in this matter and by placing a copy of said document in the U.S. mail at 10 South Wacker Drive, Chicago, Illinois 60606 with first class postage prepaid this 14th day of February 2013.

**TO:** Daniel Edelman  
Edelman, Combs, Lattner & Goodwin, LLC  
120 S. LaSalle St., Suite 1800  
Chicago, IL, 60603

s/ Gary S. Caplan